

1 **SO. CAL. EQUAL ACCESS GROUP**

2 Jason J. Kim (SBN 190246)

3 Jason Yoon (SBN 306137)

4 Kevin Hong (SBN 299040)

5 101 S. Western Ave., Second Floor

6 Los Angeles, CA 90004

7 Telephone: (213) 252-8008

8 cm@SoCalEAG.com

9 Attorneys for Plaintiff, MISTER BAILEY

10

11

12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 MISTER BAILEY,

15 Plaintiff,

16 vs.

17 GARCIAS MINI MARKET

18 CARNICERIA, LLC; GILBERTO

19 LORENZANA VALDIVIA; and DOES

20 1 to 10,

21 Defendants.

22

23

24

25

26

27

28

Case No.: 5:24-cv-00569-SSS (SHKx)

JOINT STIPULATION FOR  
DISMISSAL PURSUANT TO  
FEDERAL RULE OF CIVIL  
PROCEDURE 41(a)(1)(A)(ii)

1 Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure,  
2 Attorneys for Plaintiff MISTER BAILEY (“Plaintiff”) and Defendant GILBERTO  
3 LORENZANA VALDIVIA stipulate and jointly request that this Court dismiss the  
4 above-captioned action, with prejudice, in its entirety. Each party shall bear  
5 his/her/its own costs and attorneys’ fees.

6

7 Respectfully submitted,

8

9 DATED: October 9, 2024 SO. CAL. EQUAL ACCESS GROUP

10

11 By: /s/ Jason J. Kim  
12 Jason J. Kim  
13 Attorneys for Plaintiff

14 DATED: October 9, 2024 DOYLE SCHAFFER McMAHON, LLP

15

16

17 By: /s/ Daniel Doyle  
18 Daniel Doyle, Counsel for Defendant  
19 GILBERTO LORENZANA VALDIVIA

20 **Certification Pursuant to Local Rule 5-4.3.4(a)(2)(i)**

21 Pursuant to Local Rule 5-4.3.4(a)(2)(i), I, Jason J. Kim, do attest that all  
22 signatories listed, and on whose behalf the filing is submitted, concur in the filing’s  
23 content and have authorized the filing.

24 Dated: October 9, 2024 By: /s/ Jason J. Kim  
25 Jason J. Kim